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18
19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 MICHAEL E. LAWRENCE, an
22 individual,

23 Plaintiff,

24 vs.

25 CONVERGENT OUTSOURCING, INC.,
26 a foreign corporation; EQUIFAX
27 INFORMATION SERVICES, LLC, a
28 foreign limited-liability company;
EXPERIAN INFORMATION
SOLUTIONS, INC., a foreign corporation,

Defendants.

Case No: 2:22-cv-00749-CDS-VCF

JOINT STIPULATION OF EXTENSION
OF TIME TO RESPOND TO
COMPLAINT

FIRST REQUESTED EXTENSION

1 NOW COMES defendant Convergent Outsourcing, Inc. (“COI”) by and
2 through undersigned counsel, and plaintiff Michael E. Lawrence, by and through
3 undersigned counsel, pursuant to Local Rule IA 6-1, hereby jointly stipulate and
4 agree as follows:
5

6 WHEREAS, Plaintiff filed his Complaint on May 11, 2022;
7

8 WHEREAS, Defendant COI’s deadline to respond to Plaintiff’s Complaint
9 is June 2, 2022;
10

11 WHEREAS, due to the recent retention of counsel, COI’s counsel needs
12 additional time to investigate and prepare a response to the Complaint and/or
13 explore whether the matter can be quickly resolved;
14

15 WHEREAS, Plaintiff has agreed to give Defendant COI up through and
16 including June 16, 2022, in which to respond to Plaintiff’s Complaint;
17

18 WHEREAS, there are no other deadlines that are affected by this stipulation
19 that are presently known to the parties;
20

21 WHEREAS, this stipulation is not entered into for any improper purpose or
22 to delay and is the first request for extension by Defendant COI;
23

24 THEREFORE, Plaintiff and COI hereby stipulate and agree that COI may
25 have up through June 16, 2022 in which to respond to Plaintiff’s Complaint.
26
27
28

/s/ Kevin L. Hernandez

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Counsel for Defendant,
Convergent Outsourcing, Inc.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 6-3-2022